

December 26, 1973

PLAINTIFF'S EXHIBIT

AB-282

TO: ASBESTOS STUDY COMMITTEE

SUBJECT: ACTIVITY CONCERNING ASBESTOS

Mr. I. H. Weaver, Chairman of the Committee has kept me abreast on various activities in government, industry and in the press concerning asbestos. Because of the considerable amount of literature I am only forwarding articles that your Chairman specifically suggested I send to the Committee Members. These articles are:

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2. "Asbestos Health Question Perplexes Experts" (A summary of the Durham, N.C. meeting on the biological effects of ingested asbestos).

In addition, I have listed all the articles received from Mr. Weaver which are related to the asbestos problem. Should you wish a copy of any of these articles, please let me know. One item is a 16 page booklet entitled "CAUTION: ASBESTOS DUST.... I do not have extra copies of this booklet but they are available at a price from Channing L. Bete Co., Inc., 45 Federal Street, Greenfield, Mass. (or directly from NIOSH). See attached price list for this booklet.

The foregoing is to keep the Committee posted concerning literature on asbestos.

EWD:llz
Enc.

E. W. Drislane
Executive Director

ARTICLE (SYNOPSIS)SOURCE/AUTHORDATE

Asbestos, Talc and Nitrites in Relation to Gastric Cancer (A summary report on talc injections into hamsters indicating no carcinogenic effects)

The Medical Surveillance of Asbestos Workers (Exposure and Radiological Surveillance)

Don't Drink the Water, Don't Breathe the Air (Reserve Mining's Discharge of "Tailings" into Lake Superior)

CAUTION: ASBESTOS DUST--- (A booklet)

A review of CAUTION: ASBESTOS DUST---

The Locus of Pathogenicity of Asbestos Dust (Pathogenicity results from polyfilamentous structure)

Asbestos: Underrated Peril (A synopsis of Fritsch & Castleman allegations - primarily asbestos in industry)

Anti-Pollution Device Approved for Asbestos (The JM PENTAPURE Impinger)

Letter, Asbestos Information Association to Department of Labor (Comment on amendment to CFR permitting immediate public disclosure of monitoring results)

Criteria for Hazardous Exposure Limits (An overall survey on establishment of permissible limits for exposure to hazardous substances)

The Asbestos Industry Struggles to Comply with-Tough New Standard (Industry approaches on OSHA Asbestos Standards)

The New Dimension in Occupational Health (A history of the asbestos standard)

American Industrial Hygiene Association Journal

May 1973

Lewinsohn, H.C., Royal Society of Health Journal

April 1972

Nader, R., Harris, R., Environmental Action

September 1973

Published by Channing L. Bete Co., Greenfield, Mass. Available from NIOSH

July 1973

Swetonic, M., for Asbestos Information Association

July 1973

Gross, P., Harley, R.A. Arch Environ Health

October 1973

Environmental Action Bulletin

October 1973

Asbestos Magazine

October 1973

Mereness, R. H., of AIA

October 1973

Hatch, T.F., Arch Environ Health

October 1973

Snider, R.J., Occupational Hazards

October 1973

Occupational Hazards

October 1973

ARTICLE (SYNOPSIS)

<u>ARTICLE (SYNOPSIS)</u>	<u>SOURCE/AUTHOR</u>	<u>DATE</u>
Asbestos Dust is Linked to Disease (Asbestosis, Lung Cancer, Mesothelioma, and Gastrointestinal - brief summaries of Dr. Selikoff reports)	Occupational Hazards	October 1973
Crisis in Silver Dny (The Reserve Mining Co. court case concerning asbestos fibers in water)	TIME Magazine	October 1973
Occupational Health Factors in the United Kingdom (Diseases related to asbestos exposure)	Lewinsohn, H.C., Holmes, S.	October 1973
Data Sparse in Asbestos Scare (Reserve Mining Co. asbestos in Lake Superior - difficulty in establishing asbestos and gastro intestinal cancer link)	Medical World News	October 1973
Conference on Biological Effects of Ingested Asbestos, Durham, N.C.	Mereness, R.H., of Asbestos Information Association report	November 1973
Reserve Mining Report (Dr. Paul Gross testimony - in direct opposition to Dr. Selikoff testimony)	Special Report	November 1973
Health Effects of Ingested Asbestos Debated Inconclusively (A summary of the Durham, N.C. meeting)	Environmental Health Letter	December 1973
Type of Asbestos and Respiratory Cancer in the Asbestos Industry (Types of asbestos and their carcinogenic potentials)	Enterline, P.E., Arch Environ Health	November 1973
Asbestos Health Question Perplexes Experts (A summary of the Durham, N.C. Meeting on biological effects of ingested asbestos)	C & EN	December 1973

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December 26, 1973

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(3)

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november 27, 1971

"Safety on the Job Becomes a Major Job for Management" is the title of a feature article in the November issue of "Fortune".

The validity of this premise has been established; now management of American business must find ways to mount an efficient effort at manageable cost.

Business in the USA no longer has the luxury of setting its own pace in solving on-the-job safety and health problems. The Occupational Safety and Health Act changed that.

Industries facing the most difficult problems have found solutions; all management can learn from their examples.

"Report Series on OSHA" presents the problems and the solutions for examination.

Up to the present time most management has had to contend only with on-the-job safety, but the asbestos industry has, in addition, the serious problem of an occupational health hazard. In fact, the health hazard through exposure to asbestos dust is considered so serious that it has become the first permanent standard involving a health hazard to be promulgated by the Occupational Safety and Health Administration.

When the hazard of asbestos dust is discussed, the asbestos plant that most often enters the discussion is Johns-Manville's Manville, New Jersey plant.

JM'S Manville plant . . . can it meet all of the OSHA standards and still operate profitably?

The bull's-eye in the target for critics of American Industry's occupational health record has been the Johns-Manville plant at Manville, New Jersey. Here at this plant, one of the oldest and largest asbestos processing plants in the USA, the significant incidence of diseases connected to exposure to asbestos dust was first spotlighted. Since these diseases appear ten

twenty years after exposure, corrective measures

have been taken. The Report is biweekly, published in issues a year, subscription price is \$45.00.

taken today, or even those started ten years ago, cannot be judged as effective for certain for many more years to come. And so the argument as to whether enough is being done will continue.

During the month of November, at least two symposia on asbestos related diseases were held. The press release for the American Industrial Hygiene Association meeting on asbestos related diseases states "The meeting may become one of a controversial nature."

Meanwhile, asbestos processing at Manville continues on a best effort basis. This is not to say that all plants in the entire industry are also making a best effort.

Since 1961, complete records of dust and asbestos fiber samplings have been kept for the three operating divisions that comprise the Manville plant.

In 1969, the asbestos fiber count from a total of 397 stations was over the then JM standard TLV of 6 fibers per cubic centimeters.

In 1972 to date, the asbestos fiber count from 7 of 306 stations exceeded the OSHA standards of 5 fibers per cubic centimeter.

The program to reduce total dust and airborne asbestos fibers started at least ten years ago. The written and photographic records at Manville of these improvements over the years show how thorough and complete the change has been.

The dust collection equipment, originally installed had to be improved and upgraded year after year to meet ever more stringent JM standards. (At the imposition of the emergency asbestos standards by OSHA in December 1971, JM's own standards were comparable.)

Processes were improved and the handling of asbestos was changed from burlap bags opened in the room to sealed paper containers opened in an enclosed part of the processing machine.



Not only has the asbestos textile operation itself been simplified, but at each machine dust, suppressant is applied to the yarn to prevent fibers from detaching.

Respirators are used at any and all stations where the monitoring of the fiber count in the air determines that the OSHA standard of 5 fibers per cubic centimeter has been exceeded. These areas requiring respirators are marked by lines on the floor and posted. Even maintenance personnel entering the marked area for short periods must wear respirators.

Plant housekeeping is scheduled, controlled, and constantly checked. The mandatory procedures have become habit with all employees, and the responsibility for maintenance of standard practices lies with each plant manager. Corporate auditors for housekeeping pay unannounced visits to all JM plants such as Manville. Areas not passing prescribed practices are photographed by the auditors. The pictures are presented to the plant manager, who, within a prescribed period of about one week, must send a picture of the same area to corporate headquarters showing that the condition has been rectified. These are not just instructions written in a manual; they are conditions that can be viewed any day in any part of the Manville plant.

Manville is a plant with 2200 employees, with training and organization so well set up that no more than two dozen men are required full time for safety and environmental control. If you ask anyone at the plant why this is so, the answer is that it is everyone's job from the top-down.

Safety is so integrated with environmental control for health that it is difficult to separate them. Ask when the safety program started at Manville and the answer comes back "Before any employee here can remember." For the year 1971, three out of four manufacturing units at Manville had frequency rate of disabling injuries as low as the industries rated best by the National Safety Council. One of the four units did not have a good record for 1971. The overall disabling injury rate for the seventy-odd JM plants for the last ten-year period has steadily declined with the exception of 1971 and is among the best in manufacturing industries.

If it were not for the fact that asbestos dust, in the last five years, has become recognized as a deadly health hazard, Manville might have been touted as a model plant. An environmental control program started at Manville in 1955 with one of the first trial hygiene laboratories in any American plant, and has been progressing steadily toward correcting the health hazard conditions of dust, noise, and toxic substances before most other industries started such activities. If so much progress had not been made toward correcting the health hazard conditions over a period of many years, this plant might today have been shut down. It is ironic that this plant was the one where so many employees worked in the past

under conditions that lead to the discovery of the deadly nature of the material they were processing presumably for the benefit of man.

For those with less sentiment, who ask the question "Can American industry afford the occupational safety and health standards that the 1970 Act demands?" the answer seems also to be provided by JM's Manville plant. It is operating at a profit.

JM's Manville Plant . . . the record as the Union sees it

Organized labor, which fought hard for the passage of the 1970 Act, then worked equally hard for the "creation of a strong and effective permanent enforcement standard on asbestos under the Occupational Safety and Health Act to protect workers who are exposed to asbestos fiber dust."

Much of the Union's story of the Manville Plant was obtained in an interview with Robert Klinger, Vice President of Local 800, United Papermakers and Paperworkers). Bob Klinger is alert, knowledgeable, and impressive as representative of the Union. He started in 1959 in the Manville Plant as a machine operator in the pipe mill and has been a VP of the Local for three years, spending full time now on Union business. He participated in a presentation to the press by the Industrial Union Department, AFL/CIO on March 14, 1972, prior to the public hearings, on the permanent asbestos standard.

Until 1967, Local 800 did not receive much information from Johns-Manville concerning the relation of asbestos to the health of Manville Plant employees. According to the Union, the Public Health Service studied the Manville Plant in 1965. The results of this study were sent to the Company and to the State of New Jersey, but not to Local 800. A union request for an inspection in 1966 by the State of New Jersey produced no results because the State lacked up-to-date air sampling equipment.

As far as Local 800 is concerned, progress toward cooperation by Johns-Manville started in 1967 when, at the insistence of the Union, workers were told the results of their company medical examinations. Also in 1967, there was the October 12 letter to Marshall Smith, then President of the Local, from Dr. Maxwell Borow which pointed to 18 cases of mesothelioma in the area, possibly due to asbestos exposure. Dr. Borow stated in his letter that he had requested some financial aid toward preparing an exhibit to call the dangers of asbestos exposure to the attention of the medical profession. His letter states that he was turned down by Johns-Manville.

Bob Klinger recounted without emotion certain incidents when Local 800 was turned down by JM in the efforts to obtain cooperation toward recognition of the health hazard and the elimination of the causes. Certainly by today's standards, JM did make errors in judgement in its relations with its union.

Bob Klinger credits Marshall Smith with continuous effort, beginning in the early sixties, to educate the union members to the danger and to obtain action from the Manville Plant. In answer to a question, Bob Klinger said that he himself learned of the danger of asbestos dust about 1965 and even then treated the information with a certain amount of disbelief.

There was a strike in 1970 when the contract between JM and Local 800 ended. A hard-fought issue, although not the only one, was Union insistence on joint participation in the "elimination and control of objectionable environmental conditions at the Manville Plant."

The new labor agreement, dated January 21, 1971, established a Union/Management Environmental Control Committee. Both sides now feel this Committee brings about quick action on such environmental problems.

The way that Local 800 and the Manville Plant handle safety and health related activities has obviously built up a great deal of good will between the parties involved. Payment of wages by JM to hourly employees while they are engaged in safety and health activities passes without notice at Manville. This arrangement should not pass without notice at other companies.

Speaking from his own evaluation, but cognizant of his position as a Union official, Bob Klinger feels that conditions are well on the way to the point where he can say with confidence to a new employee that conditions at the Manville Plant are healthy as well as safe.

The Asbestos Information Association . . . it gives information and answers for an industry with a health hazard problem

Recognition of the problems that would be forthcoming from the passage of the Occupational Safety and Health Act of 1970 coincided with the formation in December 1970 of the Asbestos Information Association/North America.

Today the Association, comprised of nineteen Corporate Members, is an outstanding example of how an industry information association can function. AIA provides authoritative information on the effects of asbestos on health and how the health hazard can be controlled.

In general, the AIA has six areas of activity:

1. Within the time frame of the end of 1972 con-

• Conducting seminars on problems of asbestos related to OSHA, in four geographical areas of the USA for customers of member companies.

• Publication of a booklet "What You Need to Know about Asbestos" for employees of companies using asbestos in manufacturing and construction to serve as an employee safety and health guide.

• Maintaining contact with the Occupational Safety and Health Administration to discuss problems relating to asbestos and to obtain interpretation of standards.

• Assembling general information about the industry for members, government, and all industry.

The Executive Secretary of the Association is Matthew Swetonic, a man who can and does provide the facts and straightforward answers to questions about the health effects of asbestos.

The Asbestos Information Association is located at 22 East 40th Street, New York, N.Y. 10016.

Some generalized conclusions about the asbestos industry's experience 4 1/2 months after the permanent standards went into effect . . . The source is Matthew Swetonic, Executive Secretary, Asbestos Information Association . . .

• Most operations were not as far from the 5 fiber per cubic centimeter standard as was believed at first.

• The 5 fiber limit has been met by most operations without excessive economic drain.

• Based on the experience of a few plants, the 2 fiber limit is obtainable within the three years allowed, but it is still a problem and is expected to be costly.

• The loss of business through switch from asbestos to other materials is not yet significant.

• All manufacturers using asbestos in their products can handle asbestos in compliance with OSHA standards using known methods and technology.

OSHA . . . what's done and what's doing

A one-month (August 1972) OSHA inspection breakdown:

about half of the total inspections, 1,556, were made to the asbestos industry.

Let's go to follow up inspections. In addition to the 108 cases cited employees for failure to abate previously cited violations, with proposed fines of \$12,630.

— 557 employee complaints were received by OSHA.

— 108 cases were contested to the Occupational Safety and Health Review Commission.

Revised Part 1910 - Occupational Safety and Health Standards, which appeared in the October

APPENDIX 1.2
FPG - WINCHESTER
ANALYSES OF AIR SAMPLES
FOR lead in air

METHOD OF COLLECTION: OBT-PS-Membrane
Filter with personal sampling pump at 2 LPM
METHOD OF ANALYSIS: Atomic Absorption
Spectroscopy

DATE ANALYZED: 5/27/76
ANALYST: M. Desouky
TLV: 0.15 mg/M³

Sample No. Field Lab.	Date	Time	Total (M ³) Air Vol.	Location	Conc. mg/M ³	OPERATOR
1 633-G	4/20/76	9:50am 10:37am	.093	Book preform #19 mix No. 551-D	Trace	W. D. Bowen
2 634-G	"	9:16am 10:35am	.094	Book preform #2 mix No. 555	Trace	Robert Weaver
3 635-G	"	9:53am 10:30am	.089	Book preform #20 mix No. 555	Trace	J. F. Gano
4 636-G	"	9:56am 10:40am	.086	Book preform #4 mix No. 551-D	Trace	Martha Ratliff
5 637-G	"	9:50am 10:44am	.092	Book preform #13 mix No. 551-D	.076	George Drown
6 638-G	"	10:00am 10:44am	.086	Book preform #14 mix No. 27F	.045	Holmes Patton
7 639-G	"	10:04am 10:45am	.000	Book preform #16 mix No. 551-D	Trace	James Morris
8 640-G	"	10:07am 10:47am	.076	Book preform #21 mix No. 551-D	Trace	O. W. Turner
9 641-G	"	10:11am 10:46am	.068	Book preform trans- font operator	Trace	Nelson Spencer
10 642-G	"	10:20am 10:53am	.065	Block preform #3 mix No. 555	.135	Joanna Powell
11 643-G	"	10:28am 10:54am	.049	Block preform #2 mix No. 562-5	Trace	Sally Albert
12 644-G	"	10:30am 10:55am	.046	Block preform #1 mix No. 551-D	Trace	Douglas Rhinard

(*) Concentration in excess of TLV.

APPENDI 2
FFG - WINCHESTER

ANALYSES OF AIR SAMPLES
FOR LEAD IN AIR

METHOD OF COLLECTION: OBZ-PS-Membrane
filter with personal sampling pump at 2 LPM
METHOD OF ANALYSIS: Atomic Absorption
Spectroscopy

DATE ANALYZED: 5/27/76
ANALYST: M. DeGouky
TLV: 0.15 mg/m³

Sample No.	Date	Time	Total (M ³) Air Vol.	Location	Conc. mg/M ³	OPERATOR
13	4/20/76	10:20am 10:50am	.059	Dlok Preform #7 mix No. 551	Trace	Louis Nicholson
14	"	10:35am 10:56am	.037	Dook preform #2 mix No. 555	Trace	Robert Weaver
15	"	10:37am 10:57am	.038	Book preform #19 mix No. 551-D	Trace	W. D. Bowen
16	"	Blank	Blank	Dook preform	0.0	Blank
17	"	10:40am 10:58am	.034	Book preform #4 mix No. 551-D	Trace	Martha Ratlief
18	"	1:40pm 2:21pm	.065	Dlok preform #5 mix No. 555	.137	Joanna Powell
19	"	1:54pm 2:26pm	.064	Dlok preform #15 mix No. 551	.149*	Ralph Ellosser
20	"	1:44pm 2:10pm	.052	Dlok preform #2 mix No. 551	Trace	Sally Albert
21	"	1:46pm 2:12pm	.052	Dlok preform #7 mix No. 562-5	Trace	Louis Nicholson
22	"	2:05pm 2:28pm	.046	Dlok preform #11 mix No. 539	Trace	Clon Llewellyn
23	"	Blank	Blank	Dlok preform	0.0	Blank
24	"	2:10pm 2:32pm	.042	Dlok preform #2 mix No. 551	Trace	Sally Albert
25	"	2:21pm 2:44pm	.044	Dlok preform #5 mix No. 551-D	.197*	Joanna Powell

APPENDI O. 2
FPG - WINCHESTER
ANALYSES OF AIR SAMPLES
FOR Lead in Air

METHOD OF COLLECTION: ODZ-PS-Membrano

filter with personal sampling pump at 2 LPM

METHOD OF ANALYSIS: Atomic Absorption
Spectroscopy

DATE ANALYZED: 5/27/76
ANALYST: M. Desouky
TLV: 0.15 mg/M³

Sample No.	Lab.	Date	Time	Total (M ³) Air Vol.	Location	Conc. mg/M ³	OPERATOR
26	650-G	4/21/76	10:07am 2:42pm	.506	Inspection and packaging	Trace	James Daylins
27	659-G	"	10:02am 2:03pm	.470	Strip finish O.D. grinder #2	Trace	George Chambers
28	660-G	"	10:20am 2:27pm	.437	Lower compounding rubber mill No. 1	Trace	James Royston
29	661-G	"	10:05am 2:10pm	.475	Strip finish backgrinder #3	Trace	Allan Carter
30	662-G	"	10:12am 2:14pm	.462	Disc brake insp.	Trace	Engene Willingham
31	663-G	"	10:28am 2:16pm	.442	Insp. (Grouping) and downdraft bench	Trace	Robert Clark
32	664-G	"	10:23am 2:26pm	.459	Lower compounding rubber mill No. 3	Trace	Marcus Haines
33	665-G	"	11:30am 2:36pm	.342	Upper compounding dry line oper.	.069	C. B. Pauver
34	666-G	"	11:48am 1:44pm	.243	Upper compounding powder pumper	Trace	Joseph Palmer
35	667-G	"	11:45am 1:58pm	.263	Lower compounding dry line operator	Trace	A. M. Foreman
36	668-G	"	11:31am 2:35pm	.368	Upper compounding powder pumper	Trace	Gene Kline
37	669-G	"	11:35am 1:45pm	.255	Upper compounding asbestos weighbox	Trace	S. A. Dodson

(*) Concentration in excess of TLV

APPENDI O. 2
EPG - WINCHESTER
ANALYSES OF AIR SAMPLES

FOR Lead in Air

METHOD OF COLLECTION: ODZ-P5-Membrane
FALL 1982 ANALYSIS: Atomic Absorption
METHOD OF ANALYSIS: Spectrometry

DATE ANALYZED: 5/27/76
ANALYST: M. Desouky
TLV: 0.15 mg/H³

Spectrometry

Sample No. Field	Lab.	Date	Time	Total (M ³) Air Vol.	Location	Conc. mg/H ³	OPERATOR
38	670-G	4/21/76	11:38am 2:37pm	.360	Upper compounding dry line operator	Trace	C. M. Jones
39	671-G	"	1:45pm 2:39pm	.102	Upper compounding asbestos weigher	Trace	S. A. Dodson
40	672-G	"	1:58pm 2:25pm	.052	Lower compounding dry line operator	Trace	A. M. Foreman
41	673-G	"	4:08pm 5:40pm	.287	Strip finish ripper No. 2	Trace	Robert Dean
42	674-G	"	4:11pm 7:00pm	.347	Compound helper (coal screening)	.048	Elwood Hentz
43	675-G	4/22/76	4:53pm 7:03pm	.258	Grouping-Mezzening	Trace	Holmes Curl
44	676-G	4/21/76	4:23pm 6:38pm	.267	Plant sweeper 2nd shift	Trace	Winifred Henry
45	677-G	4/22/76	10:39pm 12:45am	.250	Maintenance oper. 3rd shift	Trace	Paul Jones
46	678-G	4/23/76	9:53am 11:48am	.222	Disc Brake Preform No. 3	Trace	R. L. Dove
47	679-G	"	9:57am 11:45am	.214	Disc brake preform No. 1	Trace	William Moreland
48	680-G	"	10:09am 11:49am	.180	Block Finish I.D." Grinder No. 1	Trace	Donald Arnold
49	681-G	"	10:10am 11:49am	.201	Block finish Burr Chamfer No. 2	Trace	Ed Farrell
50	682-G	"	9:55am 11:47am	.227	Disc brake preform No. 2	Trace	Douglas Clark

(*) Concentration in excess of TLV.

APPENDI O. 3
FPG - WINCHESTER

ANALYSES OF AIR SAMPLES
FOR Methyl Ethyl Ketone

METHOD OF COLLECTION: OBZ-PS-Perbonal

sampling pump with activated charcoal absorption tubes

METHOD OF ANALYSIS: Gas Chromatography

5/6/76

DATE ANALYZED: M. Desouky

ANALYST: 590 mg/M³

TLV:

Sample No.	Field Lab.		Date	Time	Total (M ³) Air Vol.	Location	Conc. mg/M ³	OPERATOR
1	630-G		4/23/76	9:49am 10:20am	.024	Blok finish printer No. 2	3.13	Richard Renner
2	631-G		"	9:43am 10:23am	.03	Strip finish hand printer No. 2	2.17	Calvin Fox
3	632-G		"	10:01am 10:39am	.03	Strip finish printer machine No. 10	59.23	Stephen Michael

76-3 Posting requirements in locations where excessive fiber levels are present are not being observed. Caution signs should be posted at all approaches to areas containing excessive concentrations of airborne asbestos fibers. This is an OSHA requirements as set forth in the Code of Federal Regulations, and is listed herein as a repeat recommendation dating back to our survey reports of August 14-18, 1972, October 2-6, 1972, and September 10-14, 1973.

76-9 Employees are not being notified of their own excessive exposure to airborne asbestos so that they can take appropriate protective measures whether it be through the consistent use of respirators or more careful work habits. Employees should be notified in writing of their personal exposure as soon as practicable, but not later than 5 days of the finding. They should also be advised of the corrective action being taken. This is an OSHA requirement as set forth in the Code of Federal Regulations, and is listed herein as a repeat recommendation dating back to our survey reports of August 14-18, 1972, October 2-6, 1972, and September 10-14, 1973.

DISCUSSION

During the survey, two or more short term samples were collected at each of several operators, particularly in Book and Blok Preform, to obtain averages of levels throughout the day. These particular locations are listed below with the actual and averaged values.

<u>LOCATION</u>	<u>ACTUAL LEVELS</u> <u>fibers/ml</u>	<u>AVERAGE</u> <u>fibers/ml</u>
Book Preform #19	3.78 and 4.26	4.02
Book Preform #2	4.41 and 6.85	5.63
Book Preform #4	3.56 and 6.55	5.05
Blok Preform #5	8.74, 3.01, and 5.19	5.65
Blok Preform #2	7.10, 4.41, and 5.33	5.61
Blok Preform #7	5.42 and 6.76	6.1

It would have been ideal if 5 separate samples could have been taken at each location for purposes of closer averaging and to comply with OSHA sampling requirements. However, in this instance, time was limited since some asbestos counting was

done on site in addition to sample collection. The above data do show fluctuations, but none are extreme, and it is apparent that the averages are reasonably representative of actual 8 hour time weighted exposure levels. The short term method of sampling is necessary when airborne particulate concentrations are elevated. Prolonged sampling at some locations overloads the filter, preventing accurate identification and sizing of fibers during microscopic examination. When this happens, erroneous fiber levels of from 10 to 100 times below actual concentrations may be reported.

As indicated in Appendix No. 1, book and blok preform samples continued to show elevated fiber levels, especially when related to the 2 fiber limit scheduled for adoption by OSHA in July. Since ventilation changes have not resulted in noticeable reduction from levels of December 16-20, 1974, it is apparent that sources or points of major dust release at each blok and book preform unit have not been adequately ventilated. Most past survey reports have stressed the need for proper exhaust enclosure of the mix buggies and hand transfer portions of the processes. This need is again reiterated. It is our understanding that engineering controls are to be installed at the mix buggy locations in Blok Preform in the near future. These plans should also include Book Preform where hooding installations have helped to reduce scattering and spillage, but have had moderate effect on airborne fiber concentrations.

A recent Industrial Hygiene survey at Salisbury-FPG has disclosed preform fiber levels ranging from 0.5 to 1.5 fibers/ml. One or two locations were above 2 fibers/ml, but the reasons for the excursions were easily pinpointed and were attributable solely to poor work practices. The mix buggies and weigh scales are provided with exhaust ventilation at the Salisbury plant which appears to be containing effectively airborne asbestos levels, at least to the 2 fiber level. It is suggested that FPG-Winchester inspect the mix buggy enclosures at Salisbury and consider adopting some or all of their principles of asbestos containment.

There appears to be no clear pattern of asbestos exposure as it relates to the type of mix being used at the individual work station. Careless work habits and/or excessive scattering of the mix can be assumed to be a factor, but there are no pronounced variations except for airborne lead levels within the survey data to support this contention. The operator at blok preform No. 5 was selected for sampling because of the

presence of asbestos mix on floors, equipment, and clothing, and excessive dust generation during scooping and weighing. The levels during three different sampling periods were 8.74 fibers/ml, 3.01 fibers/ml, and 5.19 fibers/ml. These values do not vary significantly from those encountered at more fastidious blok preform operations. This lack of effect of personal variables tends to further indicate that the source of excessive asbestos exposure is common in origin. Remaining, heavy sources of exposure at both book and blok preform are the mix buggies and the manual operations associated therewith.

In relation to the airborne lead results in Appendix No. 2, excursions above the 0.15 mg/m^3 Threshold Limit Value were confined to two locations in Blok Preform. One of the locations was blok preform No. 5 (sample No. 25) which, as previously stated, was selected for sampling because of excessive dust generation and poor housekeeping conditions. This operator also worked at Blok Preform No. 3 during the morning hours (sample No. 10) where airborne lead levels were high ($.135 \text{ mg/m}^3$) but not above the Threshold Limit Value. It would be advisable to provide this operator with instructions as to proper work habits and the need for consistent good housekeeping.

Throughout the plant, it was observed that only a few people were wearing respirators. In known exposure areas, only one man was so equipped. This operator's respirator was not worn continuously during dusty operations, but was only worn when the operator himself felt that protection was warranted. I inspected the respirator after the operator had deposited it on a dusty ledge, and found it to be dirty, and smudged both inside and out, and the filter was thoroughly caked with asbestos fibers and particulates.

It is imperative that a respiratory protection program be established in the plant whereby all exposed employees are provided with and required to wear approved, properly maintained respiratory protection. This recommendation has been set forth in several previous reports. Although respirators are provided on a voluntary basis within the plant, this is not sufficient since virtually all of the exposed employees remain unprotected. To have any positive or lasting effects the program must be implemented on a mandatory basis. In addition, the employees should be thoroughly instructed in the use of the equipment, and a central maintenance program should be established.

Maintenance is an important phase of any control procedure, and is as true for respirators as it is for ventilation equipment. No matter how well a respirator is designed, how good its performance, it cannot give satisfactory protection unless it is maintained in good condition. This is one of the most frequently neglected factors, particularly with routinely used respirators. The operations of a maintenance program, including frequent inspections, cleaning, replacing, or repairing worn or deteriorated parts, and storage, should be centralized. They should also be supervised carefully by a responsible and capable person since proper care and maintenance requires a thorough knowledge of the devices.

All routinely used respirators should be inspected frequently. The tightness of connections should be checked, as well as the condition of the facepiece, exhalation and inhalation valves, connecting tubes and/or cartridges, and canisters.

Respirators should be cleaned after each use, and they should be collected at a central point at the end of each shift for cleaning and inspection. Each employee's respirator should bear some sort of identification, such as his initials or clock number. When a worker receives a respirator, he should be briefed on the cleaning procedure and assured that he will always get the same device. If the respirators are serviced between shifts, only one respirator per worker is needed. If the cleaning is done during a shift, each worker will require two respirators. When not in use, the respirators should be stored in clean cabinets at convenient locations in the work area. As long as each respirator is assigned to only one person, there is no reason to require special sterilizing. Scrubbing with warm water and soap, rinsing, and air drying is adequate. When the respirator is used by only one individual, a practical method of cleaning is as follows:

1. Remove the filter or cartridge and discard.
2. Wash in detergent or soap in warm water.
3. Rinse completely in clean, warm water.
4. Air dry the device in a clean area.
5. Inspect the valves, headstraps, and other parts; replace with new parts if defective.

6. Insert new filters or cartridges; make sure the seal is tight.
7. Place in a plastic bag for storage.

After cleaning, inspection, and necessary repair, the respirators should be stored in dustproof containers, away from sunlight, heat, extreme cold, and excessive moisture. Plastic bags are adequate for routinely used respirators. They should not be stored in clothes lockers or tool boxes. Care should be taken to see that they are packed or stored so that the rubber facepiece and exhalation valve will rest in a normal position and function will not be impaired by the rubber setting in a bent or twisted position.

CONCLUSIONS

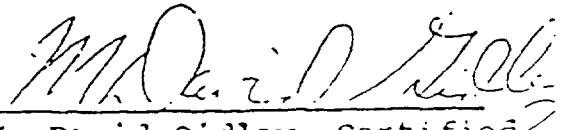
Housekeeping had been improved at several locations throughout the plant, particularly in Lower and Upper Compounding. Further improvement is needed in Blok and Book Preform.

Significant asbestos exposures are limited to two departments where design and installation of exhaust equipment are underway. Efforts should be concentrated on ventilating mix buggies and ancillary manual operations in both Book and Blok Preform. Interim protection in the form of respirators should be provided for the operators. Use of the devices should be a condition of employment in these two areas.

Isolated asbestos exposures at Disc Brake Inspection and the dry line operation in Lower Compounding require engineering control. Interim protection in the form of respirators should be provided for the operators.

I would like to thank Bob Brown and Charles Mallory for their consideration and support during the course of the survey.

SURVEYED BY:


M. David Gidley, Certified
Industrial Hygienist

6/30/76

ABEX CORPORATION
INDUSTRIAL HYGIENE SURVEY
GLOSSARY

cfm	- cubic feet per minute
Daily noise dose	- A numerical expression of the total noise exposure an employee receives during the day. If the daily noise dose exceeds 1.00, the noise exposure to the employee is excessive.
dBA	- Decibels symbol denoting the relative intensity of sound pressure levels (re: 0.0002 dyne/square centimeter)
fpm	- feet per minute
GRA	- General Room Atmosphere
mg/M ³	- milligrams per cubic meter of air
MS#	- Medical Study No.
mpcf	- million particles per cubic foot of air
NIOSH approved	- Approved by the National Institute for Occupational Safety and Health
OBZ	- Operator's Breathing Zone
ppm	- parts per million by volume
PS	- Personal Sample
TLV	- Threshold Limit Value for an 8 hour daily exposure
Ventilation	- The terms ventilated, ventilating, or exhaust imply the use of mechanical means such as a fan for air movement unless otherwise noted.

CONVERSION CHART
DAILY NOISE DOSE/8 HOUR EXPOSURE
TO dBA/8 HOUR EXPOSURE

<u>Daily Noise</u> <u>Dose/8 hr.</u>	<u>dBA/8 hr.</u>	<u>Permissible</u> <u>Employee Work</u> <u>Exposure Time</u>
0.50	85	16 hours
1.00 ← OSHA MAX. LIMIT →	90	8 hours
1.14	91	7 hours
1.33	92	6 hours
1.50	93	5.33 hours
1.71	94	4.67 hours
2.00	95	4 hours
2.28	96	3½ hours
2.67	97	3 hours
2.99	98	2.67 hours
3.43 ..	99	2.33 hours ..
4.00	100	2 hours
4.57	101	1.75 hours
5.33	102	1.50 hours
6.01	103	1.33 hours
6.83	104	1.17 hours
8.00	105	1.00 hours
8.88	106	0.90 hours
10.00	107	0.80 hours
11.42	108	0.70 hours
13.33	109	0.60 hours
16.00	110	0.50 hours
17.17	111	0.45 hours
20.00	112	0.40 hours
22.85	113	0.35 hours
26.66	114	0.30 hours
32.00	115	Less than 0.25

19661

APPI X NO. 1

FPG - WALLCHESTER

ANALYSES OF AIR SAMPLES
FOR ASBESTOS

METHOD OF COLLECTION: ODZ-PS membrane

filter with personal sampling pump at 2LPM

METHOD OF ANALYSIS: Phase Contrast
microscopy

DATE ANALYZED: 5/27-28/76

ANALYST: M. Desouky

TLV: 2 fibers/ml > 5 μ in length
(effective 7/76)

Sample No. Field Lab.	Date	Time	Total (M ³) Air Vol.	Location	Fibers/ml Conc.	OPERATOR
1 633-G	4/20/76	9:50am 10:37am	.093	Book preform #19 mix No. 551-D	3.78*	W. D. Bowen
2 634-G	"	9:46am 10:35am	.094	Book preform #2 mix No. 555	4.41*	Robert Weaver
3 635-G	"	9:53am 10:38am	.009	Book preform #20 mix No. 555	2.91*	J. F. Ganoo
4 636-G	"	9:56am 10:40am	.086	Book preform #4 mix No. 551-D	3.56*	Martha Ratliof
5 637-G	"	9:58am 10:44am	.092	Book preform #13 mix No. 551-D	3.97*	George Brown
6 638-G	"	10:00am 10:44am	.086	Book preform #14 mix No. 27E	7.12*	Holmes Patton
7 639-G	"	10:04am 10:45am	.080	Book preform #16 mix No. 551-D	4.70*	James Morris
8 640-G	"	10:07am 10:47am	.076	Book preform #21 mix No. 551-D	5.96*	O. W. Turner
9 641-G	"	10:11am 10:46am	.068	Book preform-tran- sient operator	9.10*	Nelson Spencer
10 642-G	"	10:20am 10:53am	.065	Book preform #5 mix No. 555	8.74*	Joanna Powell
11 643-G	"	10:20am 10:54am	.049	Book preform #2 mix No. 562-5	7.10*	Sally Albert
12 644-G	"	10:30am 10:55am	.046	Book preform #1 mix No. 551-D	6.98*	Douglas Rindard

(*) Concentration in excess of TLV.

APPENDIX 1

 FPG - WINCHESTER
 ANALYSES OF AIR SAMPLES
 FOR ASBESTOS

METHOD OF COLLECTION: OBZ-PS - Membrane

filter with personal sampling pump at 2 LPM

METHOD OF ANALYSIS: Phase Contrast
Microscopy

DATE ANALYZED: 5/27-28/76

ANALYST: M. Desouky

TLV: 2 fibers/ml > 5µ in length
(effective 7/76)

Sample No.	Date	Time	Total (M ³) Air Vol.	Location	Fibers/ml Conc.	Operator
13 645-G	4/20/76	10:20am	.059	Block preform #7	5.42*	Louis Nicholson
14 646-G	"	10:50am	.037	Mix No. 551	6.85*	Robert Weaver
15 647-G	"	10:35am	.038	Block preform #2	4.26*	W. D. Down
16 648-G	"	10:56am	.034	Mix No. 555	Blank	Blank
17 649-G	"	10:37am	.065	Block preform #19	6.55*	Martha Ratliff
18 650-G	"	10:57am	.064	Mix No. 551-D	3.01*	Joanna Powell
19 651-G	"	Blank	.052	Block preform #4	4.06*	Ralph Elosser
20 652-G	"	10:40am	.052	Mix No. 551	4.41*	Sally Albort
21 653-G	"	10:58am	.046	Block preform #15	6.76*	Louis Nicholson
22 654-G	"	1:40pm	.042	Mix No. 551	Blank	Blank
23 655-G	"	2:21pm	.044	Block preform #2	5.33*	Sally Albort
24 656-G	"	2:26pm		Mix No. 551	5.19*	Joanna Powell
25 657-G	"	1:44pm		Block preform #7		
		2:12pm		Mix No. 562-5		
		2:05pm		Block preform #11		
		2:20pm		Mix No. 539		
		Blank		Block preform		
		2:10pm		Block preform #2		
		2:32pm		Mix No. 551		
		2:21pm		Block preform #5		
		2:44pm		Mix No. 551-D		

(*) Concentration in excess of TLV.

APPENDI O. 1
FPG - WINCHESTER
ANALYSES OF AIR SAMPLES
FOR ASBESTOS

METHOD OF COLLECTION: ODZ-PS Membrane
filter with personal sampling pump at 2 LPM
METHOD OF ANALYSIS: Phase Contrast
Microscopy

DATE ANALYZED: 5/27-28/76
ANALYST: M. Desouky
TLV: 2 fibers/ml >5u in length
(effective 7/76)

Sample No.	Date	Time	Total (M ³) Air Vol.	Location	Fibers/ml Conc.	OPERATOR
Field Lab.						
26 658-G	4/21/76	10:07am 2:42pm	.506	Inspection and packaging	0.78	James Bayless
27 659-G	"	10:02am 2:03pm	.470	Strip finish O.D. grinder #2	0.56	George Chambors
28 660-G	"	10:20am 2:27pm	.437	Lower compounding rubber mill No. 1	1.01	James Royston
29 661-G	"	10:05am 2:10pm	.475	Strip finish backgrinder #3	0.14	Allan Carter
30 662-G	"	10:12am 2:14pm	.462	Disc brake insp.	3.07*	Eugene Willingham
31 663-G	"	10:28am 2:15pm	.442	Insp. (Grouping) at downdraft bench	0.62	Robert Clark
32 664-G	"	10:23am 2:26pm	.459	Lower Compounding Rubber Mill No. 3	0.66	Marcus Haines
33 665-G	"	11:30am 2:36pm	.342	Upper compounding Dry Line Oper.	0.34	C. B. Pauvor
34 666-G	"	11:40am 1:43pm	.243	Upper compounding Powder pumper	0.38	Joseph Palmer
35 667-G	"	11:45am 1:50pm	.263	Lower compounding Dry Line Oper.	4.53*	A. H. Foreman
36 668-G	"	11:31am 2:35pm	.388	Upper Compounding Powder pumper	0.71	Gene Kline
37 669-G	"	11:35am 1:45pm	.255	Upper compounding Asbestos weighor	1.45	S. A. Dodson

(*) Concentration in excess of TLV.

18, 1972 Federal Register, should now be available at Regional or Area OSHA offices. This revision contains amendments through September 22, 1972 and covers the many changes and corrections of typographical errors since Part 1910 was published on May 29, 1972. The revised Part 1910 contains an index for 29 CFR 1910 Occupational Safety and Health Standards. Free single copies should be available now at OSHA's 72 field offices.

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Those interested in an OSHA Subscription Service in five volumes (volumes also available individually) providing all the standards, interpretations, regulations, and procedures starting in 1973 can get applications at OSHA field offices.

.....

OSHA is developing a 100-hour home study course aimed at "recognition, avoidance, and prevention of unsafe and unhealthy working conditions" to be available in the spring of 1973 . . . for details, write Office of Training and Education, Occupational Safety and Health Administration, 400 First Street, N.W., Washington, D.C. 20210.

OSAHRC . . . it wisely considers potential harm to both employees and employers

The gravity of a job safety violation in terms of its potential harm to employees must be considered in assessing monetary penalties even in non-serious cases.

The three-man Review Commission, in unanimously affirming the decision of one of its judges, stated that "*. . . the assessment of small monetary penalties for non-serious violations having the level of gravity of the violations found in this case effectuates the purpose of the Act. Penalties of this caliber serve to remind all employers that their primary responsibility under the Act is adherence to its protective mechanisms. Failure to impose penalties relating to violations with higher levels of gravity serve only to restrain the Act's effective operation and hinder its function to reduce hazards of the workplace for all employees.*"

OSHA had cited the Hydrosplit Corporation of Salt Lake City for alleged violations found during a job safety inspection. These were failure to provide railings for stairways and open mezzanines for storage of acetone in open containers, for failure to keep fire sprinkler heads free from deposits, and for nine instances of failure to ground power tools. The Enforcement did not propose any penalties for the last other non-serious violations. The company admitted that, while it was in violation of all the standards cited on the Labor Department citation, it had

abated the violations, and that all of the violations were of such a minor nature that no penalty was warranted.

Review Commission Judge Allen M. Wienman, to whom the case was assigned, sustained the penalty proposals because, he ruled, risk of injury by falling, fire, or electrical shock was a very real possibility (OSAHRC Docket No. 591).

.....

In the case of one employer, the Review Commission ruled that the size of the business and its poor financial condition were of overriding importance.

Review Commission Judge Joseph L. Chalk had already dismissed a proposed penalty of \$165 against Colonial Craft Reproductions Inc. on the basis of previous Review Commission decisions regarding the value of relatively minor penalties in obtaining compliance with the Act.

Speaking for the majority, Commissioner Alan F. Burch stated that the Commission disagreed with Judge Chalk's conclusions that the case fell entirely within previous Review Commission decisions concerning the ineffectiveness of minimum penalties. Instead, Commissioner Burch noted that the Review Commission is charged with using four criteria in assessing penalties under the Act: the size of the business, the gravity of the violation, the good faith of the company, and its previous history of safety violations. "*We believe that in assessing civil penalties . . . occasion will arise when, despite the high gravity of the violation, overriding consideration must be given to these modifying factors in order to best effectuate the purpose of the Act. The Commission views this case as an appropriate one in which to give the modifying factors such consideration.*" The Commission considered the size of the business and its poor financial condition to be of overriding importance. (OSAHRC Docket No. 881).

OSHA Recommends ASTM Consensus Standards

Standards developed by the American Society for Testing and Materials (ASTM) are now recognized as national consensus standards by the Occupational Safety and Health Administration.

To provide the basis of new Federal job safety and health regulations, OSHA initially adopted national consensus standards of two other nationally recognized organizations, the American National Standards Institute (ANSI) and the National Fire Protection Association (NFPA).

Assistant Secretary of Labor George C. Brown, then, OSHA's head, said he had determined that standards "are national consensus standards within the meaning of the Williams-Steiger Occupational Safety and Health Act of 1970 . . . Therefore they may be promulgated as national safety standards . . ."